File IT-A

TWC Reg. No. 30347

TEXAS WATER COMMISSION
Solid Waste Compliance Monitoring Inspection Report

INSPECTION COVER SHEET

C.O. Use Only: 2-86 LEC

EPA ID No. TXD008018004 Commercial Waste Facility____ Govt. Facility____

NAME OF COMPANY General Motors Corp.

ADDRESS 2525 East Abram Rd Tel (817) 649-635

SITE LOCATION Same Arlington, Tx. Tel.____

COUNTY Tarrant TYPE OF INDUSTRY Auto Manufacturer.

Part A Application submitted to the State ? Yes X No___ To EPA ? Yes X No___ NA

Affidavit of Exclusion submitted to the State ? Yes X No___ NA

Written exclusion granted by TWC? Yes___ No X If yes, Date _____

Will this facility require a permit ? Yes___ No X (Closure in Progress)

Current Waste Management (Haz.-H, Class I NonHaz.-NH, Class II, III or check as appropriate

Generator ~~I-H, III~~ II Treatment_____ Storage NA Disposal_____ Transporter____

HW Exemptions: Sm Quan Gen.___ 90-Day Storage X Other_____

HW Facilities (circle appropriate codes): (C) T (SI) WP LT LF I TT TR WDW O

NH Facilities (circle appropriate codes): (C) T SI WP LT LF I TT TR WDW O

Anomalies in the above information will be addressed by : (a) Enforcement in progress ___

(b) Central Office ___, (c) District Office ✓, (d) Owner/Operator ___.

Inspection Information : See

Type of Inspection (circle): EV EB (EC) CL GW SA CD FO OT FE SW

Inspector's Name and Title R. Lauderdale

Inspection Participants Kent Moen (Gen Mtrs) — Tom Caldwell (HD&RE)
Tim Sewell (TWC)

Inspection Date(s) 12/19/85

Approved : [signature] District Manager

Signed : R. L. Lauderdale Inspector

Date: 1-14-86

RECEIVED
JAN 17 1986
WASTE

10/85

Texas Water Commission

INTEROFFICE MEMORANDUM

TO : Bill Brown, Field Operations Liaison, Hazardous and Solid Waste Division

DATE: January 14, 1986

THRU :

FROM : R. L. Lauderdale, Engineer, District 4

SUBJECT: General Motors Corporation - Arlington, Texas
Registration No. 30347

On December 19, 1985, the writer contacted Kent Moon, Environmental Engineer, and conducted an annual industrial waste compliance inspection of subject facility.

General Motors Corporation of Arlington paints and assembles automobiles to finished units.

All hazardous wastes except paint sludges are collected in drums and stored outside in a diked and fenced area. Drummed waste is sent to Chemical Waste Management, Lake Charles, Louisiana or Lone Mountain, Waynoke, Oklahoma for disposal. Paint thinner is shipped to Ramsey Chemical Company in Valdosa, Georgia for recycling.

Wastewater from paint booth waterfalls is generated at three paint lines. The wastewater is collected in a 40,000-gallon above-ground metal separator tank where solids are settled out. The paint sludge is collected in portable containers which are emptied into 30-cubic yard dumpsters. The supernatant liquid is pumped to a new physical, chemical waste treatment plant. Area around the separator tank is diked and any spillage is collected by a grit separator, thence is pumped to the new wastewater plant.

Portable containers also collect sludge and grit from the separators and thence deposit into 30-cubic yard dumpsters for disposal at permitted sites.

At the new wastewater plant, sludge and filter backwash cake are collected in 30-cubic yard roll-off dumpsters also from off-site disposal. Treated wastewater effluent from new plant is discharged to the sanitary sewerage system.

Closure plans have been submitted for the drum storage area and surface impoundment which has now been replaced by new wastewater plant. Drum storage area was certified closed June 28, 1985 by consulting engineer. The storage area was free of cracks and surface was clean.

Closure of the surface impoundment was about complete at inspection date. Backfill material was satisfactory. Consulting engineer will submit certification of closure January 1986 to central office.

This is reported for your information.

RLL:jc

APPROVED [signature] SIGNED R. L. Fauderdale

TWC Reg. No. 30347

TEXAS WATER COMMISSION
Solid Waste Compliance Monitoring Inspection Report

CONTENTS SHEET

FACILITY NAME General Motors Corp.

X 1. Code Sheet (0814)

X 2. Inspection Cover Sheet

X 3. Generators Checklist

X 4 General Facilities Checklist

5. Component Facility Checklists*

X A. Containers (C)

NA B. Tanks (T)

X C. Surface Impoundments (SI)

NA D. Waste Piles (WP)

___ E. Land Treatment (LT)

___ F. Landfills (LF)

___ G. Incinerators (I)

___ H. Thermal Treatment (TT)

___ I. Chemical, Physical, or Biological Treatment (TR)

___ J. Other (O) _____

NA 6. Closure and Post Closure Checklist

NA 7. Groundwater Monitoring Checklist

At No 8. Notice of Violation (NOV) Letter

X 9. Interoffice Memorandum (IOM)

No 10. Registration

No 11. Maps, Plans, Sketches

Y 12. Other (describe) Closure In Progress

* If a required Checklist is omitted, explain: _____

09/35

TWC Solid Waste Inspection Report

GENERATORS CHECKLIST

TWC Reg. No. 30347

Section A - Notification and Waste Determination (335.6, .62, .63)

***

1. Has a determination has been made that all solid wastes generated are either hazardous or nonhazardous? YES X NO ___

2. Check the method used for determination :

   a. Listed as a hazardous waste in 40 CFR Part 261, Subpart D. X
   b. Process or materials knowledge. X
   c. Tested for characteristics as identified in 40 CFR Part 261, Subpart C (If equivalent test method is used, attach a copy). X

NOTE: If a hazardous determination has not been made or appears to be incorrect, the inspector should obtain a sample of the waste for analysis and explain in comments.

3. Has the facility received an EPA ID number? N/A ___ YES X NO ___

4. Is notification of waste streams generated correct? YES X NO ___

5. Do all waste management (TSD) methods in use agree with Registration? YES X NO ___

6. Does this facility generate, treat, store, or dispose of **PCB** wastes? YES ___ NO X
   If yes, describe storage and disposition:

7. Does this facility generate **used oils** ? YES X NO ___
   If yes, describe storage and disposition:
   Waste oils are picked-up by Waste Oil reclaimer.

8. Does this facility generate **spent solvents** ? YES X NO ___
   If yes, describe storage and disposition:
   Paint Solvents disposed at permitted disposal site.

9. Does this facility utilize **sumps** in the management of hazardous waste? If yes, describe use: YES ___ NO X

*** An entry in this column indicates corrective action/response is needed

Section B - Special Conditions (335.75)

1. If generator has received from or transported to a **foreign** entity any hazardous waste, has the appropriate notice been filed with the EPA Regional Administrator? N/A X YES ___ NO ___

2. Was the waste manifested and signed by the foreign consignee? N/A X YES ___ NO ___

3. Has confirmation of waste transport out of the country been received by the generator? N/A X YES ___ NO ___

Section C - Recordkeeping and Reporting (335.9, .10, .13, .70 - .72)

1. Does the generator maintain the following records and reports (if applicable) for the necessary three years?

   a. Shipping Manifests N/A ___ YES X NO ___
   b. Monthly off-site shipment summaries N/A ___ YES X NO ___
   c. Monthly on-site land disposal summaries N/A X YES ___ NO ___
   d. Tests and analyses N/A ___ YES X NO ___
   e. Annual reports N/A ___ YES X NO ___

2. Have any spills, unauthorized discharges or threats of such discharges occurred? YES ___ NO X

   If yes, have they been reported?(335.4, .453) N/A X YES ___ NO ___

   Have they been remedied?(335.453) Explain. N/A X YES ___ NO ___

+++ DO NOT COMPLETE SECTION D IF GENERATOR DISPOSES OF WASTES ON-SITE ONLY+++

Section D - Pretransport and Manifest Requirements (335.61-68)

1. Identify primary off-site disposal facilities:

   Lone Mountain - Rt 2 Box 150A - Wayne Ko, Ok.
   Chem. Waste Management - Lake Charles, La.

2. Are off-site disposal facilities permitted or operating under interim status standards? N/A ___ YES X NO ___

3. Are TWC manifests properly completed? N/A ___ YES X NO ___

4. Has generator submitted exception reports to TWC for any original (white) copies of manifests not received? N/A X YES ___ NO ___

++++ STOP HERE IF FACILITY QUALIFIES AS A SMALL QUANTITY GENERATOR ++++

Section D - (Continued)

5. Do containers used to hold waste(s) meet DOT **packaging requirements** (49 CFR Parts 173, 178, 179) before being offered for transport (if circumstances observed)? N/A X YES ___ NO ___

6. Does generator **label** and **mark** each package in accordance with 49 CFR Part 172 (if circumstances observed)? N/A X YES ___ NO ___

7. Is each container of 110 gallons or less **marked** with the required hazardous waste warning label? N/A ___ YES X NO ___

8. Does generator **placard** off-site waste shipments in accordance with DOT regulations (49 CFR Part 172, Subpart F)? N/A ___ YES X NO ___

Section E - Accumulation Time Exemption (335.69)

Note: A facility may accumulate and store hazardous wastes in containers or tanks for up to 90 days without a permit.

1. Is each container used to temporarily store waste before transport clearly **dated**? N/A ___ YES X NO

2. Are containers and/or tanks **labeled** as "Hazardous Waste" while accumulating waste on site? N/A ___ YES X NO ___

Note: Attach a Container Storage Area Checklist for each container storage area.

Note: Attach a Tanks Checklist for each tank or each group of similar tanks.

Note: If this is a T/S/D Facility, proceed to General Facilities Checklist.

TWC Solid Waste Inspection Report

GENERAL FACILITIES CHECKLIST

TWC Reg. No. 30347

***

Section A - General Site Information

1. Are any solid waste facilities located in the 100-year floodplain ? YES___ NO X
   If yes, explain.

2. Describe land use within one mile Industrial, Commercial, residential

3. Are there any **closed** or **abandoned** solid waste facilities? YES___ NO X
   If yes, explain. Closure in progress

4. Has proof of **deed recordation** of all on-site solid waste disposal facilities been provided to the agency? N/A X YES___ NO___
   If no, explain.

5. Are all non-RCRA solid waste facilities compliant with the **general prohibitions** contained in TAC 335.4? N/A___ YES X NO___
   If no, explain.

6. An up-to-date Plant Map showing site orientation, waste management facilities, and major topographic features should be attached. Each facility checklist should have a Facility Map or Sketch attached.

+++ **Note:** For all non-RCRA facilities, do not complete the remainder of this General Facilities Checklist. Proceed to the individual facility checklists. +++

Section B - Personnel Training (335.117)

1. Owner/operator maintains proper personnel training records at the facility. N/A___ YES X NO___

2. Personnel training records include:

   a. Job title and written job description of each position. N/A___ YES X NO___

   b. Description of type and amount of training. N/A___ YES X NO___

   c. Records of training given to facility personnel. N/A___ YES X NO___

3. Personnel training records are maintained for the appropriate length of time. N/A___ YES X NO___

4. Training program is adequate for response to emergencies. N/A___ YES X NO___

*** An entry in this column indicates corrective action/response is needed.

Section C - Preparedness and Prevention (335.131-137)

1. Describe any evidence of fire, explosion, or contamination of the environment in the comments sheet.

2. Facility is equipped with: **

   a. Internal communication or alarm system within easy access. N/A___ YES X NO___

   b. Telephone or two-way radio to call emergency response personnel. N/A___ YES X NO___

   c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment are tested regularly to assure proper operation. N/A___ YES X NO___

   d. Available water supply volume and pressure are adequate for hoses, sprinklers or water spray system. N/A___ YES X NO___

3. Aisle space is sufficient to allow unobstructed movement of personnel and equipment. N/A___ YES X NO___

4. Owner/operator has attempted to make arrangements with the local response authorities to familiarize them with the layout of the facility, properties of hazardous wastes handled and associated hazards, work locations of facility personnel, entrances to facility roads and possible evacuation routes. N/A___ YES X NO___

5. In the event that more than one law enforcement or fire department might respond, a primary authority has been designated. N/A___ YES X NO___

6. Owner/operatorhas attempted to reach agreements with State emergency response teams, emergency response contractors and equipment suppliers. N/A___ YES X NO___

7. Owner/operator has attempted to make arrangements with local hospitals to familiarize them with the properties of the hazardous wastes handled and the types of injuries that could result from fires, explosions or releases from the facility. N/A___ YES X NO___

8. State or local authorities have entered into the necessary arrangements. N/A___ YES X NO___

Section D - Contingency Plan and Emergency Procedures (335.151 - .157)

1. A contingency plan is maintained at the facility. N/A___ YES X NO___

2. The contingency plan is: a. a revised SPCC plan X
   b. a separate document ____
   c. adequate to meet emergency procedures requirements. N/A___ YES X NO___

3. Emergency coordinator is on site or on call at all times. N/A___ YES X NO___

*** STOP HERE IF FACILITY ACCUMULATES WASTE ON SITE FOR LESS THAN 90 DAYS ***

TWC Solid Waste Inpection Report
(TAC 335.241-247)
CONTAINER STORAGE AREA CHECKLIST

TWC Reg. No. 30347
Reg. Facility No. N/A
Class of Wastes (H)

NOTE: TAC rules 335.241-247 apply to interim status and 90-Day Storage exempt facilities.

		***
1. Are containers in good condition?	YES X NO ___	
2. Are the containers compatible with the wastes being stored?	YES X NO ___	
3. Are containers kept closed and stored in a safe manner?	YES X NO ___	
4. Are containers inspected weekly for leakage and deterioration?	YES X NO ___	
5. Are containers holding **ignitable** or **reactive** wastes kept at least 15 meters (50 ft.) from the facility's property line?	N/A ___ YES X NO ___	
6. Are containers holding **incompatible** wastes separated by a physical barrier **or** sufficient distance?	N/A ___ YES X NO ___	
7. Does the storage area have containment protection?	YES X NO ___	

8. Describe the Container Storage Area using comments sheet and/or photos:

*** An entry in this column indicates corrective action/response is needed.

10/85

TWC Solid Waste Inspection Report
(40 CFR Part 264 Subpart G; Part 265 Subpart G)
CLOSURE-In-PROGRESS CHECKLIST

TWC Reg. No. 30347
Reg. Facility No. N/A

Note: To be completed if company is closing a hazardous waste management facility.

1. Type of facility: Auto Manufacturer

2. Type of closure: Full-Facility Closure X Partial Closure ___

3. Has closure plan received TWC approval or final modification? N/A ___ YES X NO ___ ***
   Date of approval: 12/4/85

4. If this is a partial closure, is this the last facility to be closed requiring RCRA ground water monitoring? N/A X YES ___ NO ___

5. If this is an **interim status** facility:

   a. Has an approved **public notice** of closure been published? N/A ___ YES X NO ___
      Date published: 2/21/85

   b. Is a **public hearing** required ? N/A ___ YES ___ NO X
      Date of hearing: _____

6. Has on-site closure work started ? N/A ___ YES X NO ___
   Date work initiated: 9/26/85

7. Is on-site closure work proceeding according to the work schedule in the approved closure plan ? N/A ___ YES X NO ___

8. Have 180 days elapsed since TWC approval of the closure plan? N/A ___ YES X NO ___

   a. If yes, has the Executive Director approved a closure period of greater than 180 days ? N/A ___ YES X NO ___

9. Was District Office notified of sampling event when complete removal of land-disposal facility was to have been accomplished? N/A ___ YES X NO ___

10. Were TWC samples taken during the inspection to verify completion of closure ? N/A ___ YES ___ NO X

    NOTE: List chain-of-custody tag numbers in comments section.

11. Is the closure **completed**? See Comments YES ___ NO X

12. Has the closure **certification** been submitted to TWC? N/A ___ YES ___ NO X
    Attach copy or explain. See Comments.

*** An entry in this column indicates corrective/response is needed.

12/85

TWC Reg. No. 30347

Checklist Closure / Progres

COMMENTS SHEET

Certification

Section 11,12/ Closure of drum storage area was submitted by consulting engineer June 28 1985. Final closure of surface impoundment occurred on or before 12/24/85. Consulting engineer to send closure certification to central office January 1986.

Section /

Section /

Section /

Reg. No. 30347

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report
Surface Impoundments Checklist (TAC 335.281-.288) Class of Waste (H ***

1.	Are surface impoundments presently used to treat or store waste?	Yes___	No X
	a. If yes, inspect the impoundments.		
**2.	Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard?	Yes___	No___
**3.	Check for evidence of overtopping of the dike. Is the facility compliant?	Yes___	No___
**4.	Check for evidence of seepage. Is the facility compliant?	Yes___	No___
5.	Containment system for dyked or dammed impoundments (335.283)		
**a.	Does the earthen dike have a protective cover (e.g. grass, shale, rock) to minimize wind and water erosion?	Yes___	No___
6.	What wastes are treated or stored in the impoundment? Under closure		
7.	Are waste analyses and trial tests conducted on these wastes (chemical processing of a different hazardous waste or method only)?	N/A X	Yes___ No___
	a. If not, does the owner/operator have written documented information on similar treatment of similar wastes?		Yes___ No___
8.	Is this information retained in the operating record?	N/A___	Yes___ No___
9.	Is the impoundment inspected daily to check freeboard level?		Yes___ No___
10.	Is the impoundment, dikes and vegetation surrounding the dike inspected weekly to detect leaks, deterioration or failures?		Yes___ No___

TDWR-
Page 3 of 30 of Group II
*(Changed 9/10/82, response format realigned, other minor changes)
**See Note on Page 1
***This response column indicates noncompliance.

***

11. Does the impoundment have a liner? Yes___ No___ N/A

a. If Yes, what type? _____

_____.

b. If Yes, does it have a leachate collection and removal system? Yes___ No___

**12. Is there evidence of ignitable or reactive wastes placed in the impoundment? Yes___ No___

a. If Yes, explain in comments sheet [review 335.118(a)];
or
b. If Yes, is the impoundment used solely for emergencies? Yes___ No___

**13. Is there evidence of incompatible wastes placed in the impoundment [if yes, review 335.118(b)]? Yes___ No___

14. Are monitor wells required for this site? (Refer to Rule 335.191-.195 - Ground Water Monitoring) Yes___ No___

a. Has owner/operator installed, operated and maintained a ground water monitoring system (unless waived) prior to 11/19/81? Yes___ No___

NOTE 1: Attach Ground Water Monitoring Report if answer to question 14 is yes.

15. Describe impoundment(s) site and indicate plat map, location(s) and designation(s). Also describe each impoundment's dimensions and capacity (acre-feet): Concrete structure has been removed and open-pit filled in.

_____.

NOTE 2: If the answer is No for Nos. 5a, 7a, 8, 9, 10 and No. 14 after 11/19/81, explain in comments sheet.

*(Changed 9/10/82, response formal realigned)
**See Note on Page 1
***See Note Page 3

HE/RC/TE

TXD008018004

MEMORANDUM

DATE: October 28, 2003

SUBJECT: RCRA Compliance Inspection

FROM: Mike Michaud, Chief
Surveillance Section (6EN-AS)

TO: Sam Tates, Chief
Texas Section (6EN-HT)

The attached RCRA investigation report has been prepared and reviewed by Compliance Assurance and Enforcement Division personnel. This report is being forwarded to you for your information and action.

Inspection dates: October 15-16, 2003 EPA ID Nos. TXD008018004
Name of Facility: General Motors
Facility Mailing Address: 2525 East Abram Street
Arlington, Texas 76010
Facility Owner: General Motors Telephone: 817/652-2452
Description of Facility: Automobile Assembly Plant
Type of Ownership: __Federal __State __County _Municipal X Private

Did facility request a copy of the report: X Yes ___ No

HW Activities: X Generator ___Transporter ___Treatment
___Disposal X Storage (<90 day)

Type of Inspection: X Lead __Overview X CEI __PSMS Commitment
__CME __Land Ban __ MM __BIF

INSPECTION PARTICIPANTS: (name and phone number)
EPA Inspector(s): Ken Cooper (214) 665-8047
TCEQ Inspectors: None

Facility Representative(s): Michael Bobo - Env. Engineer, Patrick McGrew, Bob Murday, Wayne Ylen (817) 652-2452

Comments: Please see the attached RCRA report for information about this investigation.

Inspector Signature: Ken Cooper Date: 10-28-03

Reviewer Signature: David Rice Date: 10-28-03

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6 - SURVEILLANCE SECTION
RCRA INSPECTION REPORT

INSPECTION DATE: October 15&16, 2003

FACILITY NAME: General Motors Assembly Plant

PARENT COMPANY: General Motors

PHYSICAL ADDRESS: 2525 East Abram Street
Arlington, Texas

MAILING ADDRESS: General Motors
2525 East Abram Street
Arlington, Texas 76010

TYPE OF INDUSTRY: SIC Code 3711

EPA ID NUMBER : TXD008018004

COMPANY PERSONNEL:

Name	Title	Phone
Michael Bobo	Env. Engineer	817/652-2452
Patrick McGrew	Waste Management	817/652-2452
Bob Murday	Director - Mfg. Engineering	817/652-2322
Wayne Ylen	Plant Engineering Manager	817/652-2358

EPA INSPECTOR/FEDERAL PERSONNEL:

Name	Title	Agency	Phone
Ken Cooper	Env Scientist	EPA - Region 6	214/665-8047

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY PERSONNEL

None			

INTRODUCTION

On October 15 and 16, 2003, a RCRA compliance evaluation inspection was conducted at the General Motors Vehicle Assembly Plant (GM) in Arlington, Texas, by EPA Inspector - Ken Cooper. According to GM representatives, the GM - Arlington plant, which

began operation in 1954, is responsible for the final assembly of several different models of sport utility vehicles (SUVs), including the Chevrolet Suburban and Tahoe, GMC Yukon, Yukon XL, and Cadillac Escalade. GM manufactures about 400 vehicles per shift at their current production rate. Approximately 3,000 employees work at the Arlington, Texas vehicle assembly facility. GM is registered as a large quantity hazardous waste generator with RCRA regulated waste tanks and container storage areas. GM also has multiple hazardous waste satellite accumulation areas scattered throughout the assembly plant.

FACILITY INSPECTION AND OBSERVATIONS

I arrived at the GM - Arlington, Texas facility on the morning of October 15, 2003, and contacted Michael Bobo and Bob Murday of GM, and Patrick McGrew of Waste Management, the company that provides environmental support to GM. During the opening conference, I presented my EPA credentials and informed the facility representatives that EPA had scheduled the GM- Arlington Plant for a hazardous waste compliance evaluation investigation. We briefly discussed the scope of the inspection, including the RCRA related topics that would be covered and the areas of the facility that would be inspected. I requested copies of GM's Annual Waste Summary and Notice of Registration, which are included as Attachments #1 and #2. Mr. Bobo then provided a brief description of the company's vehicle assembly process. According to Michael Bobo, the majority of the SUV preparation, assembly, and painting work is performed at the Arlington plant, even though, motors, transmissions, and frames are shipped in from other GM locations. There are actually two parts of the assembly line at the GM plant. One part of the assembly line is for the chassis portion of the vehicle. This portion of the assembly line is where the frame, wheels, motor, transmission, and other components are attached to the chassis of the vehicle. The other part of the assembly line is for the body portion of the vehicle. This part of the assembly line is where the body component panels are welded together to form the visible structure of the vehicle. After the basic body structure is assembled, the vehicle body is first treated using a phosphate conversion process and later treated using an electrophoretic deposition prime process (ELPO). These two steps, which prepare the vehicle bodies for the paint shop, generate two different types of wastes. Wastewater from the phosphate conversion process is pumped to the facility's wastewater treatment area where it is treated to remove metals (see Attachment A for a diagram of the wastewater treatment process). The resulting wastewater treatment sludge from the phosphate conversion process is a listed waste (F019). The F019 sludge is the second largest

quantity hazardous waste stream generated at the GM facility. Some hazardous waste (D008) is also generated from the ELPO process, which previously used primer products containing lead. Although company has stopped using lead containing products, the ELPO filters and debris from the process still have to be handled as hazardous waste, due to residual lead levels in the system (see Attachment ELPO -1 for a waste profile sheet). After the vehicle bodies leave the ELPO process, they enter the paint shop building. At the paint shop, the vehicle bodies first enter the "Prime Booth" where additional primers are sprayed onto the surfaces of the vehicles to prepare them for painting. After the primer is applied and dried, the vehicles are ready for the paint. The paint operation consists of a two part process with a base coat that contains color pigments and a clear-coat which is applied over the base coat to provide durability, luster, and protection. The automated painting operations are routinely performed by robotic arms inside four large paint booths, designated "A, B, C, and Prime" (see Attachment B - Paint Shop diagram). Painting and primer operations are the sources of the majority of hazardous wastes generated at the GM - Arlington facility. These wastes are generically called "purge solvents or purge thinners". Purge solvent wastes are generated from multiple locations in the painting operations booths where solvents are used to clean and purge paint/primer lines, spray guns(bells), and paint nozzles. Purge solvent is typically used to clean paint guns and lines between color changes and to periodically clean the clear-coat and primer lines and spray apparatus. During purging/cleaning activities, each robotic arm discharges purge solvent into a funnel like device inside the paint booth which drains into purge pots which are located adjacent to the paint booths (purge pots are also shown on Attachment B). The paint shop diagram shows four purge pots associated with each of the A, B, and C paint booths and two purge pots at the Prime paint booth. A photograph of a purge pot is included with this report (GM requested that photographs taken during this inspection not be released to the public or to another company). Purge solvent from the purge pots is pumped into a purge solvent piping system that carries the used solvent to an outdoor 12,000 gallon purge solvent tank. The piping carrying the purge solvent to the purge solvent tank is double walled except for the portion between the purge pot and the ceiling (see Attachment C for a diagram of a purge pot). The purge solvent tank is a registered hazardous waste tank with secondary containment. Over-spray from the painting process is captured by a water curtain below the conveyor system. The water flows into water traps on the lower level of the paint shop building. The water and paint mixture then goes through a "detactification process" that makes the paint float on top of

the water, so it can be readily removed. The paint is then skimmed off the surface of the water and the resulting nonhazardous waste paint float is collected in rolloff boxes and is shipped off-site for disposal as Class 1 industrial waste. After the paint float is removed from the water, the water is returned to the water curtain system for reuse. The air from the paint booths is routed through large on-site thermal oxidizers, which destroy the organic components from the painting process, before it is released to the atmosphere.

According to Michael Bobo, GM does not consider purge solvent a waste until it reaches the company's waste purge solvent tank. Reportedly, it is GM's position that the purge solvent is still being used for its solvent properties (to keep the lines clean) while it is in the piping system between the paint booths and the waste purge solvent tank. Mr. Bobo provided a legal brief describing GM's position which was filed in the U.S. Court of Appeals for the District of Columbia in August 2003 (see Attachment #3 for a copy). He also provided a copy of the letter he sent to TNRCC where he stated his opinion about the re-use of used purge solvent, which is similar to GM's position (see Attachment #4 for a copy of his letter). Also included, is a copy of a return letter from TNRCC that appears to offer no objections to GM position (see Attachment #5).

After Michael Bobo stated GM's position, I informed the GM representative that EPA has a different opinion about used purge solvent, which is paraphrased as follows. EPA has determined that the used purge solvent is a waste since the used purge solvent is physically removed (i.e., piped) from the spray painting applicator units and will no longer be used to clean the spray paint applicators. The wastes (used purge solvent and waste paint) that have been removed from the spray paint application unit are then conveyed through the purge recovery system to the waste purge solvent storage tank. All components of the purge recovery system (e.g., flow equalization tanks, recirculation tanks, associated piping, pumps, valves, flanges, connectors, and other equipment), are subject to the hazardous waste requirements because the purge recovery system's sole function is to convey the waste from the spray paint applicator to the hazardous waste storage tank. Therefore, since GM stores purge solvents in a hazardous waste tank, the facility would be required to comply with 40 CFR Part 265, Subparts J, BB, and CC. Subparts BB and CC requirements apply to waste handling equipment between the point of generation of the hazardous waste and the waste purge solvent tank. At GM's - Arlington facility, the waste generation point also appears to be where the purge solvent is discharged from the end of the spray paint applicators.

Subpart BB requirements apply to equipment that contains or contacts hazardous wastes with organic concentrations of at least ten percent by weight.

Information provided by GM for purge solvents, which was taken from product MSDS sheets and waste profile sheets, indicates that waste purge solvent has an organic concentration of at least ten percent by weight (see Attachment #6 for a copy of the company's Waste Analysis Plan which contains information about wastes & waste characterization test methods).

After our initial discussions, we talked about all the hazardous waste storage and handling areas at the Arlington facility. According to the environmental representatives, GM has five hazardous waste container storage areas, two hazardous waste storage tanks, a wastewater treatment system that generates F019 sludge, and approximately 17 satellite accumulation areas. At the time of the inspection, the GM - Arlington plant was operating as a less than 90 day hazardous waste storage facility. The remainder of the morning was spent checking contingency plans, waste analysis plans, and other RCRA required records. The contingency plan was in the process of being updated and rewritten to reflect current personnel and policy. The waste analysis plan did not directly reference Subpart CC testing methods but GM did have enough analytical information to make determinations based on MSDS and process knowledge information.

During the afternoon, I took a tour of the plant with Michael Bobo and Patrick McGrew to inspect the hazardous waste tanks, container storage areas, wastewater treatment area, and different areas of the manufacturing process. At the time of the inspection, the two hazardous waste tanks were properly labeled and appeared to be well maintained (see attached photo #1). Although the waste purge solvent tank was in use, the waste paint tank was empty and, reportedly, is rarely used by GM (see Attachment # 7 for a copy of the daily waste tank inspection form). The external piping and tank components were individually labeled to distinguish them for leak detection monitoring as required by Subpart BB (see Attachment D for a diagram of the hazardous waste tanks and associated piping and components). According to Michael Bobo, GM has been monitoring the piping and components from the purge pots to the truck loading area on a monthly basis since he began working for GM in mid-2000. Prior to that time, the company had not been performing leak detection monitoring on the all the various components in the waste handling system (see Attachment #8 for a copy of a "Audit Self Disclosure Letter" which was sent to the TNRCC shortly after

Michael Bobo began working at the Arlington Plant). Reportedly, the company decided to begin performing Subpart BB and CC monitoring on all the components in contact with hazardous wastes even though they did not believe that the solvent wastes should be regulated prior to the hazardous waste tanks (see Attachment #9 for a copy of recent monthly leak monitoring records). The monitoring records also include additional leak monitoring that is performed around the paint booths and mix room. We continued the field investigation by inspecting the main hazardous waste container storage area, wastewater treatment area, and mix room. The main container storage area held several containers of hazardous wastes that had been recently generated. All the waste containers in the main container storage area were stored and labeled as required. No leaks, spills, or areas of concern were observed in the area. At the paint mix room, one waste tote and one drum for contaminated rags/refuse were observed inside the mix room. Both waste containers in the mix room were closed and labeled as required. At the wastewater treatment area, one hazardous waste container (rolloff box) was observed which was approximately 75 percent full of F019 sludge. No hazardous waste labels were observed on the rolloff box as we walked around all four sides of the container. After pointing out the missing labels to the company representatives, hazardous waste labels were applied to the container. Before we left the area, I also mentioned the fact that the top of the rolloff box was not closed. According to Michael Bobo, the top of the rolloff box is opened when a new waste container is placed under the filer press sludge loading chute, so dewatered sludge can fall directly into the container. Although the top of the rolloff box stays open until the container is full of sludge, the rolloff box is kept inside a closed room to limit access to the container. After the rolloff box is filled with sludge, the top of the container is closed prior to shipping. Sampling records indicated that there was very little organic material in this sludge. The sludge was mostly composed of lime and treatment chemicals used to remove metals from the wastewater. Later in the plant tour, we observed several satellite accumulation areas in the main mix room, fluid fill area, and the adhesives/sealers area. All of the containers observed in the satellite accumulation areas were closed and labeled properly. At the end of the day, we returned to the environmental offices and reviewed additional records before I left the facility.

I returned to the GM plant on the morning of October 16, 2003 to continue the RCRA investigation. I concentrated on inspection records, waste manifest shipment records, waste

analysis records, and documentation records which indicated that GM was operating as a <90 day storage facility. The records appeared to be well organized and readily available. After finishing up the RCRA records review portion of the inspection, we returned to the hazardous waste tanks area and the paint shop in order to photograph tanks and equipment in those areas of the plant. Shortly before noon, we contacted GM's front office to arrange an exit interview, so we could discuss the RCRA inspection findings.

EXIT INTERVIEW AND COMPLIANCE ASSISTANCE

After completing the RCRA compliance evaluation inspection, I held a final exit interview with Wayne Ylen, Michael Bobo, and Patrick McGrew of GM. During the exit interview, I discussed my inspection findings, areas of concern, and recommendations. I informed the GM representatives that I discovered the following areas of concern during the RCRA inspection.

1. GM had failed to label the hazardous waste container (rolloff box) at the wastewater treatment area which containing F019 waste, as required by 40 C.F.R. 262.34 (a)(3). Shortly after the container was inspected, GM attached new hazardous waste labels to the rolloff box.

2. GM did not close the top of the hazardous waste rolloff box containing wastewater treatment sludge (F019 waste) during the loading process, as required by 40 C.F.R. 265.173. According to Michael Bobo, "in order to mitigate the situation during loading, the rolloff box containing wet sludge is kept inside a closed room to ensure containment and prevent access". In addition, the outside of the containment room was marked with a hazardous waste sign.

3. GM failed to perform all required leak detection monitoring on the piping and components (valves, pumps, tanks, and lines) subject to Subpart BB standards prior to June 2000, as required by 40 C.F.R. 265.1052-1058. See the attached Audit Self Disclosure Letter from GM to TNRCC included as Attachment #8. After the Self Disclosure Letter was sent to TNRCC, GM evaluated their waste handling systems and began performing leak detection monitoring on the regulated components, even though, they do not agree with EPA's previously discussed position - "that the point of generation for waste purge solvents is at the point where the solvent/paints exit the paint applicators". GM's Petition for Review Brief on this issue is included as Attachment #3.

4. The section of the purge solvent pipeline between the purge pots and the ceiling is only single walled (the piping appears to be double walled from the ceiling to the waste purge solvent tank). 40 C.F.R. 265.193 (f) requires secondary containment for ancillary equipment (piping). GM stated that the single walled piping was inside the paint shop building and that any spill that might occur from this piping would be contained by the building and the sumps on the lower floor of the building, if a large spill did occur. The secondary containment areas are reportedly inspected on a daily basis (see Attachment #7).

Recommendation: I recommended that GM add language to improve their Waste Analysis Plan by defining sampling and analytical methods that should be used to properly identify and quantify the VOC content of hazardous wastes subject to Subpart BB and CC regulations.

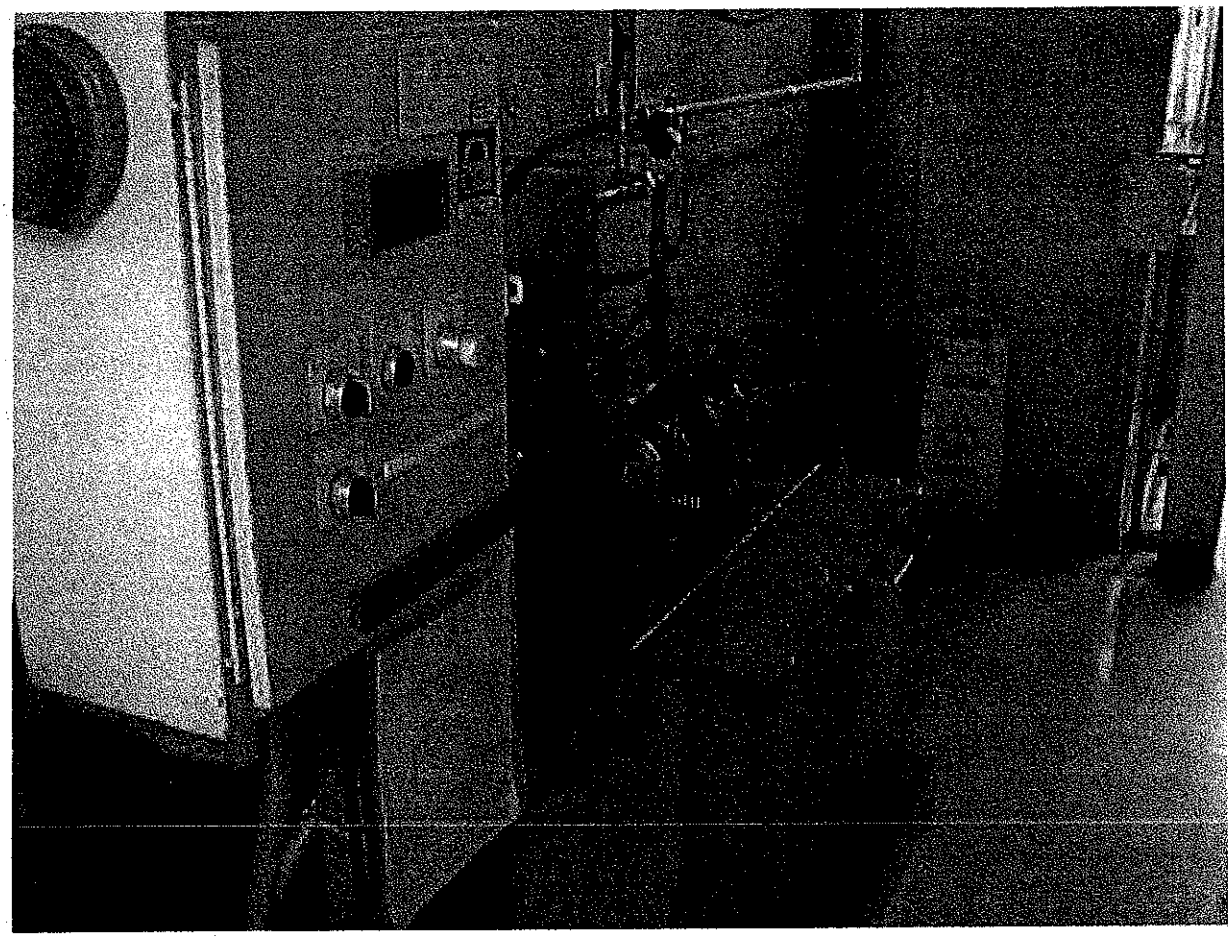
Ken Cooper

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log

Photo # 1

Photographer: Ken Cooper	Date: 10-16-03	Time: 1220 Hrs
City/County: Arlington/Tarrant		State: TX
Location: General Motors Arlington Assembly Plant		
Subject: Hazardous waste tanks (Waste Purge Solvent Tank on the left and Waste Paint Tank on the right - empty)		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log

Photo # 2

Photographer: Ken Cooper	Date: 10-16-03	Time: 1228 Hrs
City/County: Arlington/Tarrant		State: TX
Location: General Motors Arlington Assembly Plant		
Subject: Purge pot on right & switch box.		

Attachment #2

IHW020 *** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY *** Page: 1
Notice of Registration Date: 09/23/03
Industrial and Hazardous Waste

This registration does not constitute authorization of any waste management activities or facilites listed below. The registration reflects hazardous and/or industrial waste generation and management activities for which the registrant has provided notification. Requirements for solid waste management are provided by Texas Administrative code section 335 of the rules of the Texas Commission on Environmental Quality (TCEQ). Changes or additions to waste management methods referred to in this notice require written notification to the TCEQ.

Solid Waste Registration Number: 30347 EPA Id: TXD008018004

The Solid Waste Registration Number provides access to computerized and filed information pertaining to your operation. Please refer to that number in any correspondence.

Company Name: General Motors Corporation
Site Name: Arlington Plant
Site Location: 2525 E Abram Street, Arlington, TX
Contact: BOBO, MICHAEL

Region: 4
County: 220 Tarrant
Title: Environmental Engineer Phone: 817-652-2452

Initial Registration Date: 04/12/1976
Last Amendment Date: 09/18/2003
Last Date NOR Computer update: 09/23/2003

Mailing Address: 2525 E Abram Street
Arlington, TX 76010-

Site Street Address: 2525 E Abram Street
Arlington, TX 76010-

Registration Status: Active
Registration Type: Generator
Generator Type: Industrial

Reporting Method: STEERS

Hazardous Waste Generation Status: Large Quantity Generator

NAICS Code: 336211 Motor Vehicle Body Manufacturing
Handler Status:

Operator Information
Name:
Phone:
Address:

Owner Information
Name: General Motors Corporation
Phone: 817-652-2452
Address: 2525 E Abram Street
Arlington, TX, 76010-

As of 09/18/2003 - the next unassigned sequence number for WASTES is 9038 and
the next unassigned sequence number for UNITS is 014.

Section 335, Chapter 31 of the Texas Adminstrative Code specifies the notification, record keeping, manifesting and reporting requirements for hazardous and industrial solid wastes.

30347 General Motors Corporation

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
****** Active Wastes ******						
10095191 1		Active	06/23/94	On/Off	No	No

Description from Generator: Paint sludge; from our paint booths; painting of automobiles generates paint sludge and debris, such as, sludge filters, rags contaminated with paint sludge; nonhazardous.
Refers to waste code (6): 150110
Texas Form Code: 519 Other inorganic sludges
Current Management Units: Contain Store Area 001; Misc Store Container 003 008
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Paint sludge and debris

10124061 1 Active 06/23/94 On/Off No

Description from Generator: Plastic drum liners; removal of liners from 55 gallon drums and 5 gallon pails
Refers to waste code (6): 179200
Texas Form Code: 406 Empty fiber or plastic containers
Current Management Units: Contain Store Area 001; WWTP 009; Misc Store Container 003
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Drum Liners

10133081 1 Active 09/11/00 Off No No

Description from Generator: RCRA empty crushed drums and plastic containers. 1992
Texas Form Code: 308 Empty or crushed metal drums or containers
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

10143111 1 Active 06/23/94 On/Off No

Description from Generator: Asbestos and asbestos contaminated debris; removal of asbestos from plant equipment, protective clothing contaminated with asbestos, and asbestos contaminated debris
Refers to waste code (6): 179390
Texas Form Code: 311 Asbestos solids and debris
Current Management Units: Contain Store Area 001; Misc Store Container 003
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Asbestos

10179992 2 Active 06/24/96 On/Off No No

Description from Generator: rubber tires/tires are scrapped due to punctures, flats,blemishes,etc./9/93; generated by plant production. Waste is recycled off site by Safe Tire Disposal for rubber recycling. jds 10-2-00.
Texas Form Code: 999 Plant Refuse
Current Management Units: Misc Store Container 005
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): tires

30347 General Motors Corporation

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

****** Active Wastes ******

10282051 1 Active 10/04/01 On/Off No No
Description from Generator: Oily Water from mopping up Heavy Repair area
Texas Form Code: 205 Oil-water emulsion or mixture
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Mop Water

10294091 1 Active 10/11/00 On/Off No No
Description from Generator: Combines TNRCC#'s 10211191,10223101,10033101
Texas Form Code: 409 Other non-halogenated organic solids
Current Management Units: Misc Store Container 005
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Mixed Industrial Was

10323101 1 Active 09/11/00 Off No No
Description from Generator: Filters and sludge from zinc phosphating of automotive bodies as part of the anti-corrosion process.
Texas Form Code: 310 Spent solid filters or adsorbents (inorganic)
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Phosphate Filters/S1

10332961 1 Active 09/11/00 Off No No
Description from Generator: Antifreeze from PM and vehicle filling operations. Recycling: Waste is recycled on site as oil recovery per STEERS notification dated 11Aug2000. jc
Texas Form Code: 296 Ethylene glycol based antifreeze
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Antifreeze(Eth.Gly.)

10373101 1 Active 10/04/01 On/Off No No
Description from Generator: Paint Filters from changeout.
Texas Form Code: 310 Spent solid filters or adsorbents (inorganic)
Current Management Units: Misc Store Container 003 008
* Origin Codes: 1 Onsite-process/service

20013192 2 Active 06/23/94 On/Off No
Description from Generator: Spent demineralizer resin beads; beads used in powerhouse deionizer to make D.I. water; removes mineral from city water
Refers to waste code (6): 270131
Texas Form Code: 319 Other waste inorganic solids
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Resin beads

30347 General Motors Corporation

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

****** Active Wastes ******

20059992 2 Active 09/01/95 On/Off No
Description from Generator: Plant production refuse; plant trash, such as cardboard, packaging materials, food waste, glass, foil, plastics.
Texas Form Code: 999 Plant Refuse
Current Management Units: Misc Store Container 003
Waste Compactor 011
* Origin Codes: 1 Onsite-process/service

20073192 2 Active 09/11/00 Off No No
Description from Generator: Used and obsolete electrical equipment and computer parts such as monitors. Non-PCB.
Texas Form Code: 319 Other waste inorganic solids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Electrical/Computer

20119992 2 Active 12/20/00 Off No Yes
Description from Generator: Cafeteria waste grease
Texas Form Code: 999 Plant Refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Kitchen Grease

20159992 2 Active 12/20/00 Off No No
Description from Generator: Recyclable used office paper and newsprint
Texas Form Code: 999 Plant Refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Mixed Office Paper

20173192 2 Active 01/29/01 On/Off No No
Description from Generator: Gauze, bandages, syringes, needles, blood contaminated materials, obsolete medical materials
Texas Form Code: 319 Other waste inorganic solids
Current Management Units: Misc Store Container 004
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Medical Waste

30347 General Motors Corporation

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

****** Active Wastes ******

9001211H H Active 01/27/94 On/Off No No
Description from Generator: Purging of paint equipment with solvent. New analytical shows presence of MEK in used product
Refers to waste code (6): 916600
Texas Form Code: 211 Paint thinner or petroleum distillates
EPA Form Code: W211 Paint thinner or petroleum distillates
EPA Hazardous Waste Numbers: D001 D035
Current Management Units: Contain Store Area 013
Tank (Surface) 002 007
* Origin Codes: 1 Onsite-process/service
* Source Codes: G06 Painting and coating
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Purge thinner

9002211H H Active 01/27/94 On/Off No No
Description from Generator: Waste paint, solvents, gasoline from assembly and painting operations not currently managed in tanks
Refers to waste code (6): 916940
Texas Form Code: 211 Paint thinner or petroleum distillates
EPA Form Code: W211 Paint thinner or petroleum distillates
EPA Hazardous Waste Numbers: D001 D018 D035 F003 F005
Current Management Units: Contain Store Area 001 013
Tank (Surface) 007
* Origin Codes: 1 Onsite-process/service
* Source Codes: G06 Painting and coating
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing

9003210H H Active 01/27/94 On/Off No No
Description from Generator: Hazardous Rags, Sealers and Derbris
Refers to waste code (6): 980270
Texas Form Code: 210 Adhesives or epoxies
EPA Form Code: W210 Reactive or polymerizable organic liquids and adhe
EPA Hazardous Waste Numbers: D001 F005
Current Management Units: Tank 010
Contain Store Area 001 013
* Origin Codes: 1 Onsite-process/service
* Source Codes: G13 Cleaining out process equipment G11 Discarding off-specification or out-of-date chemic
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Sealers & Adhesives

30347 General Motors Corporation

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

****** Active Wastes ******

9009310H H Active 06/23/94 On/Off No No
Description from Generator: ELPO Filters and Debris Contaimenated with lead.
Refers to waste code (6): 973340
Texas Form Code: 310 Spent solid filters or adsorbents (inorganic)
EPA Form Code: W310 Filters, solid adsorbents, ion exchange resins and
EPA Hazardous Waste Numbers: D008
Current Management Units: Contain Store Area 001
Misc Store Container 003
* Origin Codes: 1 Onsite-process/service 2 Spill clean-up
* Source Codes: G16 Oil changes and filter or battery replacement G15 Process equipment change-out or discontinuation of
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Lead contaminated filters & debris

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9031306H H Active 09/11/00 On/Off No No
Description from Generator: Wastewater treatment filter cake from the process of treating our plant process water, Start 7-24-00 Material to be F019 due to using Aluminum in theBody. The chemical compostion of the waste should not change. Will look into delisting.
Texas Form Code: 306 "Dry" lime or metal hydroxide solids not "fixed"
EPA Form Code: W501 Lime and/or metal hydroxide sludges and solids wit
Current Management Units: WWTP 009
* Origin Codes: 1 Onsite-process/service
* Source Codes: G23 Wastewater treatment (sludge, filter cake, etc.)
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): WWT SLUDGE F019

9034101H H Active 10/04/01 On No No
Description from Generator: Wastewater from Elpo Phosphate area, treated on site in WWT plant
Texas Form Code: 101 Aqueous waste with low solvents
EPA Form Code: W101 Very dilute aqueous waste containg more than 99% w
EPA Hazardous Waste Numbers: D008
Current Management Units: WWTP 009
* Origin Codes: 1 Onsite-process/service
* Source Codes: G09 Other production or service-related processes
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Wastewater from Elpo

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* The first value is considered the primary value (e.g. primary origin code).
As of 09/18/2003, the next unassigned sequence number for WASTES is 9038.

** No Longer Generated Wastes **

10013011 1 Inactive 04/30/01 NA No No
Description from Generator: Clean up of spill (oil); 8/2/93 began removing soil Waste inactivated dueto one-time shipment.
Texas Form Code: 301 Soil contaminated with organics
Current Management Units: Contain Store Area 001
* Origin Codes: 2 Spill clean-up

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Refer to 40 CFR Part 261 for Descriptions of EPA Hazardous Waste Numbers.

30347 General Motors Corporation

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

10023881 1 Inactive 01/17/01 NA No No
Description from Generator: Removal of fluorescent light tubes from light fixtures; 8/93 Waste inactivated due to rule change.
Texas Form Code: 388 Empty or crushed glass containers
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service

10033101 1 Inactive 04/30/01 NA No No
Description from Generator: Drained oil filters removed from plant equipment and automobiles; 9/93 Waste inactivated due to rule change.
Texas Form Code: 310 Spent solid filters or adsorbents (inorganic)
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service

10049013 3 Inactive 06/13/96 NA No Yes
Description from Generator: Rubber tires/tires are scrapped due to punctures, flats, irregular blemishes, etc.
Refers to waste code (6): 380400
Texas Form Code: 901 Plant production refuse
Current Management Units: Misc Store Container 005
* Origin Codes: 1 Onsite-process/service

10052961 1 Inactive 05/04/01 NA No
Description from Generator: Removal of antifreeze from automobiles, plant equipment; obsolete antifreeze due Waste inactivated due to product change.
Refers to waste code (6): 108320
Texas Form Code: 296 Ethylene glycol based antifreeze
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service 2 Spill clean-up
Company's Internal Code(s): Antifreeze

10062061 1 Inactive 12/20/00 NA No No
Description from Generator: Oil removed from automobiles, plant equipment; obsolete oil due to processchang Waste inactivated due to rule change.
Refers to waste code (6): 110450
Texas Form Code: 206 Waste oil
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service 2 Spill clean-up
Company's Internal Code(s): Oil

10075041 1 Inactive 01/17/01 NA No
Description from Generator: Wastewater treatment filter cake from the process of treating our plant process Waste inactivated due to product change.
Refers to waste code (6): 141710
Texas Form Code: 504 Other inorganic wastewater treatment sludge
Current Management Units: WWTP 009
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): WWT Filter Cake

30347 General Motors Corporation

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

10085191 1 Inactive 01/18/02 NA No
Description from Generator: Plant sludge from the grit separator which collects plant process water plant sl Waste inactivated due to one-time shipment.
Refers to waste code (6): 149000
Texas Form Code: 519 Other inorganic sludges
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Plant Sludge (Grit Separator Sludge) and debris

10103191 1 Inactive 01/05/01 NA No
Description from Generator: Gauze, bandages, syringes, needles, blood contaminated materials, obsoletemedic Waste inactivated due to error in submission.
Refers to waste code (6): 170421
Texas Form Code: 319 Other waste inorganic solids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service 2 Spill clean-up
Company's Internal Code(s): Medical waste

10113961 1 Inactive 04/30/01 NA No
Description from Generator: Electrical Equipment possibly containing PCB's removed from equipment; changes i Waste inactivated due to product change.
Refers to waste code (6): 177140
Texas Form Code: 396 Nonhazard elec equip/dev >=50 ppm & <500 ppm PCBs
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service 2 Spill clean-up
Company's Internal Code(s): PCB Electrical Equipment

10153191 1 Inactive 04/30/01 NA No
Description from Generator: Ceramic fill's ceramic material removed from the Reeco; nonhazardous Waste inactivated due to one-time shipment.
Texas Form Code: 319 Other waste inorganic solids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Ceramic Fill

10163022 2 Inactive 04/30/01 NA No No
Description from Generator: CONSTRUCTION SOIL & DEBRIS FROM TRUCK CONVERSION CONSTRUCTION ACTIVITIES;6/95 Waste inactivated due to one-time shipment.
Texas Form Code: 302 Soil contaminated with inorganics only
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): CONTAMINATED SOIL/DE

30347 General Motors Corporation

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

10183881 1 Inactive 01/17/01 NA No No
Description from Generator: FLUORESCENT LIGHT TUBES & HD LIGHT TUBESREMOVED FROM OPERATION IN PLANT & OFFICE Waste inactivated due to rule change.
Texas Form Code: 388 Empty or crushed glass containers
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): LIGHT TUBES

10199992 2 Inactive 05/08/97 NA No No
Description from Generator: NONPCB LIGHT BALLASTS REMOVED FROM LIGHTFIXTURES IN THE PLANT & OFFICES
Texas Form Code: 999 Plant Refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): NONPCB LIGHT BALLAST

10206081 1 Inactive 04/30/01 NA No No
Description from Generator: sanitary sludge; clean out from sanitarypipes, traps, etc. Waste inactivated due to one-time shipment.
Texas Form Code: 608 Sewage or other untreated biological sludge (org.)
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): sanitary sludge

10211191 1 Inactive 04/30/01 NA No No
Description from Generator: NONHAZARDOUS SEALERS & ADHESIVES Waste inactivated due to source reduction.
Texas Form Code: 119 Other inorganic liquids
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): NONHAZ SEALERS & ADH

10223101 1 Inactive 04/30/01 NA No No
Description from Generator: Non haz. abs. from liquid overflow of vehicle assembly. Also includes abs. from repair of vehicles. Consists of cotton pads, oil dry, socks, and misc. non-flammable fluids. (oil, ATF, antifreeze, brake fluid, etc.) 1992 Waste inactiva
Texas Form Code: 310 Spent solid filters or adsorbents (inorganic)
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service

10233092 2 Inactive 01/17/01 NA No No
Description from Generator: Batteries for recycling - Nickel CadmiumLithium, Alkaline Waste inactivated due to rule change.
Texas Form Code: 309 Batteries or battery parts, casings, cores
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Batteries

30347 General Motors Corporation

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

10243191 1 Inactive 04/30/01 NA No No
Description from Generator: Fiberglass debris from demolition of fuel oil tanks for closure. Consistsof fiberglass material and residual soil. First generated 1/2000. Waste inactivated due to one-time shipment.
Texas Form Code: 319 Other waste inorganic solids
Current Management Units: Waste Pile 006
* Origin Codes: 7 Cor action/closure

10273192 2 Inactive 04/30/01 NA No No
Description from Generator: Non-PCB light ballasts removed light fixtures in plant & offices. 1992 Waste inactivated due to error in submission.
Texas Form Code: 319 Other waste inorganic solids
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service

10304882 2 Inactive 04/30/01 NA No No
Description from Generator: Removal of rail road ties from construction activities. TCLP run for metaland semivolatiles. Chromium result 0.79 mg/l everything else below detection limit. Waste inactivated due to one-time shipment.
Texas Form Code: 488 Wood debris
Current Management Units: Waste Pile 006
* Origin Codes: 2 Spill clean-up
Company's Internal Code(s): RR TIES

10314031 1 Inactive 04/30/01 NA No No
Description from Generator: PUMPS REMOVED FROM SERVICE W/ NON HAZARDOUS SEALERS OR URETHANE. Waste inactivated due to one-time shipment.
Texas Form Code: 403 Solid resins or polymerized organics
Current Management Units: Contain Store Area 001
* Origin Codes: 2 Spill clean-up
Company's Internal Code(s): URETHANE PUMPS

10344091 1 Inactive 09/16/02 NA No No
Description from Generator: Non-PCB Ballasts removed from out-of-service light fixtures Waste inactivated due to error in submission.
Texas Form Code: 409 Other non-halogenated organic solids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Non-PCB Light Ballas

10354061 1 Inactive 09/16/02 NA No No
Description from Generator: Plastic Drums for Recycling Waste inactivated due to rule change.
Texas Form Code: 406 Empty fiber or plastic containers
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Plastic Drums for Re

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Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

10363081 1 Inactive 09/16/02 NA No No
Description from Generator: Metal drums for recycling Waste inactivated due to source reduction.
Texas Form Code: 308 Empty or crushed metal drums or containers
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Metal Drums for Recy

10383961 1 Inactive 09/18/03 NA No No
Description from Generator: PCB Ballasts > = 50ppm PCBs and < 500 ppm PCBs; Due to waste minimization,ingredient changes or process changes this waste is no longer generated.
Texas Form Code: 396 Nonhazard elec equip/dev >=50 ppm & <500 ppm PCBs
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

10394891 1 Inactive 09/18/03 NA No No
Description from Generator: Contaminated Dirt; Due to waste minimization, ingredient changes or process changes this waste is no longer generated.
Texas Form Code: 489 Petroleum contaminated solids
Current Management Units: None
* Origin Codes: 2 Spill clean-up

10404091 1 Inactive 09/18/03 NA No No
Description from Generator: Out of date Sealers; Due to waste minimization, ingredient changes or process changes this waste is no longer generated.
Texas Form Code: 409 Other non-halogenated organic solids
Current Management Units: None
* Origin Codes: 2 Spill clean-up
Company's Internal Code(s): SEALER OUT OF DATE

20029012 2 Inactive 09/01/95 NA No No
Description from Generator: Plant production; plant trash such as, cardboard, packaging material, food waste, glass, foil, plastics
Refers to waste code (6): 280240
Texas Form Code: 901 Plant production refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Plant Trash

20039022 2 Inactive 05/08/97 NA No
Description from Generator: Supplemental plant production refuse; floor sweepings, defective/obsolete automobile parts (nonmetal)
Refers to waste code (6): 370770
Texas Form Code: 902 Supplemental plant production refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Plant wastes

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Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

20049032 2 Inactive 09/01/95 NA No No
Description from Generator: Plant office refuse; office trash cafeteria food wastes, plates, cups, food packaging waste, aluminum cans & food
Refers to waste code (6): 280160
Texas Form Code: 903 Plant Office refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Office trash

20069992 2 Inactive 05/04/01 NA No
Description from Generator: Plant office refuse; office trash, cafeteria food wastes, plates, cups, food pac Waste inactivated due to error in submission.
Texas Form Code: 999 Plant Refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

20084092 2 Inactive 04/26/01 NA No No
Description from Generator: Weathered Asphalt from construction activities. Used as substitute for rawmaterial, material not a waste.
Texas Form Code: 409 Other non-halogenated organic solids
Current Management Units: Waste Pile 006
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Weathered Asphalt

20093012 2 Inactive 09/18/03 NA No Yes
Description from Generator: Dirt with Paint Sludge. Extensive analytical proves material is non-hazardous.; Due to waste minimization, ingredient changes or process changes thiswaste is no longer generated.
Texas Form Code: 301 Soil contaminated with organics
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Soil with Paint Slud

20103072 2 Inactive 01/17/01 NA No No
Description from Generator: Ferrous and non-ferrous scrap metal including iron, steel, and copper Waste inactivated due to rule change.
Texas Form Code: 307 Metal scale, filings, or scrap
Current Management Units: Misc Store Container 003
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Mixed Scrap Metal

20123072 2 Inactive 01/17/01 NA No No
Description from Generator: Off-spec lead wheel weights collected for recycling Waste inactivated dueto rule change.
Texas Form Code: 307 Metal scale, filings, or scrap
Current Management Units: Misc Store Container 003
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Lead Wheel Weights

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Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

20133082 2 Inactive 01/17/01 NA No No
Description from Generator: Off-spec metal drums sent for reconditioning Waste inactivated due to error in submission.
Texas Form Code: 308 Empty or crushed metal drums or containers
Current Management Units: Misc Store Container 003
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Metal drums for recy

20144062 2 Inactive 01/17/01 NA No No
Description from Generator: Plastic drums sent for recycling/reconditioning Waste inactivated due to error in submission.
Texas Form Code: 406 Empty fiber or plastic containers
Current Management Units: Misc Store Container 003
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Plastic drums for re

20163191 1 Inactive 01/29/01 NA No No
Description from Generator: Gauze, bandages, syringes, needles, blood contaminated materials, obsoletemedical materials Waste inactivated due to error in submission.
Texas Form Code: 319 Other waste inorganic solids
Current Management Units: Misc Store Container 004
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Medical Waste

2019211H H Inactive 03/07/02 NA No No
Description from Generator: Unused Leaded Gasoline From AST Clean out. Waste inactivated due to errorin submission.
Texas Form Code: 211 Paint thinner or petroleum distillates
EPA Form Code: W211 Paint thinner or petroleum distillates
EPA Hazardous Waste Numbers: D001 D008 D018
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: G11 Discarding off-specification or out-of-date chemic
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing

9004409H H Inactive 04/30/01 NA No No
Description from Generator: Solvent contaminated absorbant material; solvent contaminated rags, protective c Waste inactivated due to product change.
Refers to waste code (6): 910110
Texas Form Code: 409 Other non-halogenated organic solids
EPA Form Code: W409 Other organic solids
EPA Hazardous Waste Numbers: D001 F003
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service 2 Spill clean-up
* Source Codes: G13 Cleaining out process equipment G06 Painting and coating
G19 Other one-time intermittent processes
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Absorbent Material

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Refer to 40 CFR Part 261 for Descriptions of EPA Hazardous Waste Numbers.

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Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

9005117H H Inactive 04/30/01 NA No No

Description from Generator: Liquid mercury; removal of mercury from meters and other plant equipment.Waste inactivated due to one-time shipment.
Refers to waste code (6): 912520
Texas Form Code: 117 Waste liquid mercury
EPA Form Code: W117 Waste liquid mercury
EPA Hazardous Waste Numbers: D009 U151
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service 2 Spill clean-up
* Source Codes: G15 Process equipment change-out or discontinuation of G19 Other one-time intermittent processes
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing

9006219H H Inactive 04/30/01 NA No No

Description from Generator: Alcohols; waste alcohol used to clean vehicle bodies in preparation of sealer ap Waste inactivated due to product change.
Refers to waste code (6): 918410
Texas Form Code: 219 Other organic liquids
EPA Form Code: W219 Other organic liquid
EPA Hazardous Waste Numbers: D001
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
* Source Codes: G09 Other production or service-related processes G13 Cleaining out process equipment
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Alcohol

9007319H H Inactive 05/08/97 NA No No

Description from Generator: Kolene, sodium hydroxide; kolene used in hot molten bath to burn paint off of booth grates; waste kolene salts are dug out of bath periodically.
Refers to waste code (6): 970150
Texas Form Code: 319 Other waste inorganic solids
EPA Form Code: W319 Other inorganic solids
EPA Hazardous Waste Numbers: D002
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: G02 Stripping and acid or caustic cleaning
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Kolene salts

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Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete
** No Longer Generated Wastes **						

9008319H H Inactive 04/30/01 NA No No
Description from Generator: Mercury contaminated equipment & debris; removal of process equipment containing Waste inactivated due to one-time shipment.
Refers to waste code (6): 972210
Texas Form Code: 319 Other waste inorganic solids
EPA Form Code: W319 Other inorganic solids
EPA Hazardous Waste Numbers: D009
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service 2 Spill clean-up
* Source Codes: G15 Process equipment change-out or discontinuation of G32 Cleanup of spill residues
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Mercury equipment & debris

9010301H H Inactive 04/30/01 NA No No
Description from Generator: CONTAMINATED SOIL FROM CLOSURE OF HAZARDOUS WASTE TANKS; ORGANICS;10/95 Waste inactivated due to one-time shipment.
Texas Form Code: 301 Soil contaminated with organics
EPA Form Code: W301 Contaminated Soil
EPA Hazardous Waste Numbers: D001 F003
Current Management Units: Contain Store Area 001
* Origin Codes: 7 Cor action/closure
* Source Codes: G41 Closure of hazardous waste management unit under R
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): CONTAMINATED SOIL

9011003H H Inactive 04/30/01 NA No No
Description from Generator: mixed labpack from wastewater treatment laboratory; obsolete products Waste inactivated due to one-time shipment.
Texas Form Code: 003 Mixed lab packs
EPA Form Code: W001 Lab packs with no acute hazardous waste
EPA Hazardous Waste Numbers: D001 D002 D003 D009 D011
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: G22 Laboratory analytical wastes (used chemicals)
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): TXD052649027

90120031 1 Inactive 12/20/00 NA No No
Description from Generator: NONHAZARDOUS WWT CHEMICALS; LABPACK Waste inactivated due to one-time shipment.
Texas Form Code: 003 Mixed lab packs
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): 90120031-LABPACK

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Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

9013211H H Inactive 04/30/01 NA No No

Description from Generator: P3 PAINT LINE CLEANER 118 (NMP FOR RECYCLE) Waste inactivated due to one-time shipment.
Texas Form Code: 211 Paint thinner or petroleum distillates
EPA Form Code: W211 Paint thinner or petroleum distillates
EPA Hazardous Waste Numbers: D001
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: G01 Dip, flush or spray rinsing
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): 9013211H

9014219H H Inactive 04/30/01 NA No No

Description from Generator: DI (2-ETHYLHEXYL) PHTHALATE (DEHP); OBSOLETE MATERIAL Waste inactivated due to product change.
Texas Form Code: 219 Other organic liquids
EPA Form Code: W219 Other organic liquid
EPA Hazardous Waste Numbers: U028
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
* Source Codes: G11 Discarding off-specification or out-of-date chemic
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): DEHP
New Chemical Substance: Yes

9015319H H Inactive 01/17/01 NA No No

Description from Generator: HID light bulbs removed from operation in plant & office areas. 1/2000 Waste inactivated due to rule change.
Texas Form Code: 319 Other waste inorganic solids
EPA Form Code: W319 Other inorganic solids
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
* Source Codes: G11 Discarding off-specification or out-of-date chemic
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing

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Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

9016309H H Inactive 01/17/01 NA No No

Description from Generator: Lead acid batteries for recycling. Off spec lead acid batteries from vehicle assembly .1999 Waste inactivated due to rule change.
Texas Form Code: 309 Batteries or battery parts, casings, cores
EPA Form Code: W309 Batteries, battery parts, cores, casings
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
* Source Codes: G11 Discarding off-specification or out-of-date chemic
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing

9017409H H Inactive 04/30/01 NA No No

Description from Generator: Waste from Spill Clean up of solvent. Contains PPE, Absorbent material. Waste codes may vary. Waste inactivated due to one-time shipment.
Texas Form Code: 409 Other non-halogenated organic solids
EPA Form Code: W409 Other organic solids
Current Management Units: Contain Store Area 001
* Origin Codes: 2 Spill clean-up
* Source Codes: G32 Cleanup of spill residues
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Solvent Spill C/U

9032801H H Inactive 04/30/01 NA No No

Description from Generator: Unusable and empty Aerosol Paint Cans Waste inactivated due to source reduction.
Texas Form Code: 801 Organic gases
EPA Form Code: W801 Compressed gases
EPA Hazardous Waste Numbers: D001
Current Management Units: Contain Store Area 001
* Origin Codes: 1 Onsite-process/service
* Source Codes: G06 Painting and coating
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Aerosol paint cans

9033219H H Inactive 09/18/03 NA No No

Description from Generator: Formic Acid; Due to waste minimization, ingredient changes or process changes this waste is no longer generated.
Texas Form Code: 219 Other organic liquids
EPA Form Code: W219 Other organic liquid
EPA Hazardous Waste Numbers: D002
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: G02 Stripping and acid or caustic cleaning
* Measurement Points: 1 Before mixing
* NAICS Code: 336211 Motor Vehicle Body Manufacturing
Company's Internal Code(s): Formic Acid

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Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

** No Longer Generated Wastes **

9035004H H Inactive 09/18/03 NA No No

Description from Generator: Out of use Potassuim Cyanide Lab Pack; Due to waste minimization, ingredient changes or process changes this waste is no longer generated.
Texas Form Code: 004 Lab packs containing acute hazardous wastes
EPA Form Code: W004 Lab packs containing acute hazardous waste
EPA Hazardous Waste Numbers: P098
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: G11 Discarding off-specification or out-of-date chemic
* Measurement Points: 1 Before mixing
* NAICS Code: 336112 Light Truck and Utility Vehicle Manufacturing
Company's Internal Code(s): LAB PACK CYANIDE

9036004H H Inactive 09/18/03 NA No No

Description from Generator: Chloroform Lab Packed- Unused out of date; Due to waste minimization, ingredient changes or process changes this waste is no longer generated.
Texas Form Code: 004 Lab packs containing acute hazardous wastes
EPA Form Code: W004 Lab packs containing acute hazardous waste
EPA Hazardous Waste Numbers: U044
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: G11 Discarding off-specification or out-of-date chemic
* Measurement Points: 1 Before mixing
* NAICS Code: 336112 Light Truck and Utility Vehicle Manufacturing
Company's Internal Code(s): LAB PACK CHLOROFORM

9037001H H Inactive 09/18/03 NA No No

Description from Generator: Mixed LAB PACK; Due to waste minimization, ingredient changes or process changes this waste is no longer generated.
Texas Form Code: 001 Lab packs of old chemicals only
EPA Form Code: W001 Lab packs with no acute hazardous waste
EPA Hazardous Waste Numbers: D001 D002 D007 D009 D011
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: G11 Discarding off-specification or out-of-date chemic
* Measurement Points: 1 Before mixing
* NAICS Code: 336112 Light Truck and Utility Vehicle Manufacturing
Company's Internal Code(s): LAB PACK MIXED

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**** UNITS AT THIS SITE MANAGING WASTE ****

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date

** 'Active' & 'Closure Pending' Units **

001 Contain Store Area — Active — 11/01/84 — 1 2 H/ — NA — NA — NA — NA /

Description from Company: Barrel Yard on West Side Plant outside of the "30 Line" of the plant.

System Types: 141 Storage, bulking, and/or transfer off-site - no tr

Wastes Currently Managed in Unit:
10013011 Clean up o, 10023881 Removal of, 10033101 Drained oi, 10052961 Removal of, 10062061 Oil remove
10095191 Paint slud, 10113961 Electrical, 10124061 Plastic dr, 10143111 Asbestos a, 10163022 CONSTRUCTI
10211191 NONHAZARDO, 10223101 Non haz. a, 10233092 Batteries, 10273192 Non-PCB li, 10282051 Oily Water
10314031 PUMPS REMO, 20013192 Spent demi, 9002211H Waste pain, 9003210H Hazardous, 9004409H Solvent co
9005117H Liquid mer, 9006219H Alcohols;, 9008319H Mercury co, 9009310H ELPO Filte, 9010301H CONTAMINAT
9014219H DI (2-ETHY, 9015319H HID light, 9016309H Lead acid, 9017409H Waste from, 9032801H Unusable a

Wastes Previously Managed in Unit:
10153191 10354061 10363081 10383961 10404091 108320 110450 110650 141710 150110 177140
179200 179280 179390 179450 184990 2019211H 270131 9007319H 9033219H 9035004H 9036004H
9037001H 910110 912520 916940 918410 952000 970150 972210 973340 980270

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002 Tank (Surface) — Active — H/ — NA — NA — NA /

Description from Company: Bulk Storage Tank, Waste Purge Thinner (12,000 Gallon Capacity)

System Types: 141 Storage, bulking, and/or transfer off-site - no tr

Wastes Currently Managed in Unit: 9001211H Purging of

Wastes Previously Managed in Unit: 9002211H 910110 916600 916940

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003 Misc Store Container — Active — 1 2 H/ — NA — NA — NA /

Description from Company: Roll-Off boxes

System Types: 141 Storage, bulking, and/or transfer off-site - no tr

Wastes Currently Managed in Unit:
10095191 Paint slud, 10124061 Plastic dr, 10143111 Asbestos a, 10373101 Paint Filt, 20059992 Plant prod
20103072 Ferrous an, 20123072 Off-spec l, 20133082 Off-spec m, 20144062 Plastic dr, 9009310H ELPO Filte

Wastes Previously Managed in Unit:
10013011 10075041 10085191 10153191 10404091 141710 149000 150110 179200 179280 179390
20029012 20039022 20049032 20069992 280160 280240 370510 370760 370770 380200 380270
380400

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004 Misc Store Container — Active — 01/27/94 — 1 2/ — NA — NA — RCRA Pmt Exempt - Accumulation Time — NA /

Description from Company: Misc. storage containers; containers for medical waste located in the plant

System Types: 141 Storage, bulking, and/or transfer off-site - no tr

Wastes Currently Managed in Unit: 20163191 Gauze, ban, 20173192 Gauze, ban

Wastes Previously Managed in Unit: 10103191 170421

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005 Misc Store Container — Active — 01/27/94 — 1 2 3/ — NA — NA — RCRA Pmt Exempt - Accumulation Time — NA /

Description from Company: Misc Storage containers; scrap tires for shipment to recycling company loca ted near salvage building

System Types: 141 Storage, bulking, and/or transfer off-site - no tr

Wastes Currently Managed in Unit: 10049013 Rubber tir, 10179992 rubber tir, 10294091 Combines T

30347 General Motors Corporation

Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date

** 'Active' & 'Closure Pending' Units **

006 Waste Pile — Active — 06/12/96 — 1 2/ NA — NA — NA — RCRA Pmt Exempt - Accumulation Time — NA /
Description from Company: Non Hazardous solid waste mgmt unit for soil from construciton activities
System Types: 132 Landfill or surface impoundment that will be close 141 Storage, bulking, and/or transfer off-site - no tr
Biennial System Regulatory Status: Regulatory status unknown
Wastes Currently Managed in Unit: 10243191 Fiberglass 10304882 Removal of 20084092 Weathered
Wastes Previously Managed in Unit: 10163022 20093012

007 Tank (Surface) — Active — 05/22/97 — H/ NA — NA — NA — RCRA Pmt Exempt - Accumulation Time — NA /
Description from Company: Paint and Thinner waste from paint shop operations
Capacity: 12000.0000 Capacity Unit of Measure: G
System Types: 141 Storage, bulking, and/or transfer off-site - no tr
Biennial System Regulatory Status: Regulatory status unknown
Wastes Currently Managed in Unit: 9001211H Purging of 9002211H Waste pain

008 Misc Store Container — Active — 05/22/97 — 1/ NA — NA — NA — Non-Hazardous Regulated — NA /
Description from Company: Paint and Plant Sludge (grit seperator) sludge roll off boxes
Capacity: 32.0000 Capacity Unit of Measure: Y
System Types: 141 Storage, bulking, and/or transfer off-site - no tr
Biennial System Regulatory Status: Regulatory status unknown
Wastes Currently Managed in Unit: 10095191 Paint slud 10373101 Paint Filt
Wastes Previously Managed in Unit: 10085191

009 WWTP — Active — 05/22/97 — 1 H/ NA — NA — NA — Non-Hazardous Regulated — NA /
Description from Company: Waste Water Treatment Filter Cake Roll Off Boxes
Capacity: 32.0000 Capacity Unit of Measure: Y
System Types: 141 Storage, bulking, and/or transfer off-site - no tr
Biennial System Regulatory Status: Regulatory status unknown
Wastes Currently Managed in Unit: 10075041 Wastewater 10124061 Plastic dr 9031306H Wastewater 9034101H Wastewater

010 Tank — Active — 05/22/97 — H/ NA — NA — NA — RCRA Pmt Exempt - Accumulation Time — NA /
Description from Company: Tote for Accummulation of semi-solid waste sealers, adhesives, greases
Capacity: 300.0000 Capacity Unit of Measure: G
System Types: 141 Storage, bulking, and/or transfer off-site - no tr
Biennial System Regulatory Status: Regulatory status unknown
Wastes Currently Managed in Unit: 9003210H Hazardous

011 Waste Compactor — Active — 05/22/97 — 2/ NA — NA — NA — Non-Hazardous Regulated — NA /
Description from Company: Plant Trash Compactors (2) WITH 42 YD TRASH PACKER BOXES
Capacity: 42.0000 Capacity Unit of Measure: Y
System Types: 141 Storage, bulking, and/or transfer off-site - no tr
Biennial System Regulatory Status: Regulatory status unknown
Wastes Currently Managed in Unit: 20059992 Plant prod
Wastes Previously Managed in Unit: 20069992

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Unit Number	Unit Type	Unit Status	Date of Status	Classes of Waste Managed in Unit Onsite / Offsite	Unit Permit Number	Unit # on Permit	Regulatory Status	Deed Recording Needed/Date
** 'Active' & 'Closure Pending' Units **								
012	Sump	Active	12/20/00	/ NA	NA	NA	Non-Hazardous Regulated	NA /
Description from Company: Waste cafeteria grease sump Capacity: 3000.0000 Capacity Unit of Measure: g System Types: 039 Other recovery or reclamation for reuse including Wastes Currently Managed in Unit:								
013	Contain Store Area	Active	10/04/01	H/ NA	NA	NA	RCRA Permit Exempt<90 Day Storage	NA /
Description from Company: Container Storage Area in main mix room Capacity: 700.0000 Capacity Unit of Measure: g System Types: 141 Storage, bulking, and/or transfer off-site - no tr Wastes Currently Managed in Unit: 9001211H Purging of 9002211H Waste pain 9003210H Hazardous								

As of 09/18/2003, the next unassigned sequence number for UNITS is 014.

Index to NOR for Solid Waste Registration Number 30347 General Motors Corporation
for wastes and units

Wastes

Index to NOR for Solid Waste Registration Number 30347 General Motors Corporation
for wastes and units

Wastes

Waste Code	Waste Description	NOR Page	Old Texas Waste Code
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20029012	Plant production; plant trash such as, cardboard,	11	
20039022	Supplemental plant production refuse; floor sweepi	11	
20049032	Plant office refuse; office trash cafeteria food w	12	
20069992	Plant office refuse; office trash, cafeteria food	12	
20084092	Weathered Asphalt from construction activities. Us	12	
20093012	Dirt with Paint Sludge. Extensive analytical prove	12	
20103072	Ferrous and non-ferrous scrap metal including iron	12	
20123072	Off-spec lead wheel weights collected for recyclin	12	
20133082	Off-spec metal drums sent for reconditioning Wast	13	
20144062	Plastic drums sent for recycling/reconditioning W	13	
20163191	Gauze, bandages, syringes, needles, blood contamin	13	
2019211H	Unused Leaded Gasoline From AST Clean out. Waste	13	
9004409H	Solvent contaminated absorbant material; solvent c	13	
9005117H	Liquid mercury; removal of mercury from meters and	14	
9006219H	Alcohols; waste alcohol used to clean vehicle bodi	14	
9007319H	Kolene, sodium hydroxide; kolene used in hot molte	14	
9008319H	Mercury contaminated equipment & debris; removal o	15	
9010301H	CONTAMINATED SOIL FROM CLOSURE OF HAZARDOUS WASTE	15	
9011003H	mixed labpack from wastewater treatment laboratory	15	
90120031	NONHAZARDOUS WWT CHEMICALS; LABPACK Waste inactiv	15	
9013211H	P3 PAINT LINE CLEANER 118 (NMP FOR RECYCLE) Wast	16	
9014219H	DI (2-ETHYLHEXYL) PHTHALATE (DEHP); OBSOLETE M	16	
9015319H	HID light bulbs removed from operation in plant &	16	
9016309H	Lead acid batteries for recycling. Off spec lead	17	
9017409H	Waste from Spill Clean up of solvent. Contains PPE	17	
9032801H	Unusable and empty Aerosol Paint Cans Waste inact	17	
9033219H	Formic Acid; Due to waste minimization, ingredient	17	
9035004H	Out of use Potassuim Cyanide Lab Pack; Due to wast	18	
9036004H	Chloroform Lab Packed- Unused out of date; Due to	18	
9037001H	Mixed LAB PACK; Due to waste minimization, ingredi	18	
		0	
		0	
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Index to NOR for Solid Waste Registration Number 30347 General Motors Corporation
for wastes and units

Wastes

Waste Code	Waste Description	NOR Page	Old Texas Waste Code
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Units

Unit Sequence Number	Unit Description	NOR Page
** Active and Closure Pending Units **		
001	Barrel Yard on West Side Plant outside of the "30	19
002	Bulk Storage Tank, Waste Purge Thinner (12,000 Gal	19
003	Roll-Off boxes	19
004	Misc. storage containers; containers for medical w	19
005	Misc Storage containers; scrap tires for shipment	19
006	Non Hazardous solid waste mgmt unit for soil from	20
007	Paint and Thinner waste from paint shop operations	20
008	Paint and Plant Sludge (grit seperator) sludge rol	20
009	Waste Water Treatment Filter Cake Roll Off Boxes	20
010	Tote for Accummulation of semi-solid waste sealers	20
011	Plant Trash Compactors (2) WITH 42 YD TRASH PACKER	20
012	Waste cafeteria grease sump	21
013	Container Storage Area in main mix room	21